

LAW OFFICE OF

MICHAEL K. BACHRACH

224 WEST 30TH STREET, SUITE 302
NEW YORK, N.Y. 10001

TEL. (212) 929-0592 • FAX. (866) 328-1630

MICHAEL K. BACHRACH *

* admitted in N.Y., MN and D.C.

<http://www.mbachlaw.com>

michael@mbachlaw.com

April 20, 2024

By ECF


The Hon. Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

REQUEST GRANTED IN PART.

The Sentencing hearing previously set for April 23, 2024 is
RESCHEDULED to May 23, 2024 at 10:00AM in Courtroom
15C at the 500 Pearl Street Courthouse.

4/22/2024

SO ORDERED.


LEWIS J. LIMAN
United States District Judge

***Re: United States v. Laureano, et al.,
22 Cr. 58 (LJL)***

Dear Judge Liman:

We represent Defendant Carlos Laureano in the above-referenced matter and write to respectfully request an adjournment of Mr. Laureano's sentencing hearing in light of this Court's Order, dated, April 16, 2024 (Doc. No. 67), which provided notice that "the Court is considering a substantial upward variance from the Guidelines sentence," and in turn from the sentence recommended by the Probation Department.

In light of the Court's Order, the defense needs more time to prepare for sentencing. Additionally, due to a lockdown at Mr. Laureano's place of detention, we have learned that he has been without access to any of his legal materials, including the parties' sentencing memorandum, which he too needs time to review prior to sentencing.

Mr. Laureano's sentencing is presently scheduled for **Tuesday, April 23, 2024, at 11:30 a.m.** To also avoid scheduling conflicts that counsel have related to other cases in May, we respectfully request an adjournment to the week of June 3, 2024, or as soon thereafter as is convenient to the Court.

Thank you for your time and consideration.

Yours sincerely,



Michael K. Bachrach
Elizabeth E. Macedonio

Attorneys for Defendant Carlos Laureano

cc AUSA Christopher Clore
AUSA Rushmi Bhaskaran